

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL TWO)

Docket No. RM2018-5

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LEAVE TO FILE REPLY COMMENTS REGARDING PROPOSAL TWO
(August 2, 2018)

Order No. 4630 (June 1, 2018) established the procedural schedule in this proceeding and, while setting a date for initial comments, made no provision for reply comments. Initial comments were filed on July 26, 2018 by UPS and by the Public Representative. The comments of UPS cover a variety of subjects, but ultimately support approval of Proposal Two. UPS Comments at 1, 11. The Public Representative, on the other hand, identifies a number of alleged deficiencies, and professes an inability to conclude that Proposal Two is an improvement over the status quo. PR Comments at 18. The Postal Service believes that the concerns expressed by the Public Representative are unfounded, and therefore requests leave to file reply comments addressing the issues that she raises, as well as responding to one comment made by UPS.

The questions raised by the Public Representative largely address matters of theoretical statistical sampling principles. While the Postal Service acknowledges the potential importance of viewing issues from this perspective, the Postal Service disagrees with much of the analysis offered in the Public Representative comments, and in particular the conclusions drawn therefrom. In order to afford the Commission with a more complete discussion of these matters, to which the Postal Service has had

no previous opportunity to respond, the Postal Service seeks leave to respond in otherwise unauthorized reply comments. In addition, one claim made by UPS in its comments could potentially be misconstrued, and the Postal Service believes that clarification on that matter would also be beneficial. The Postal Service reply comments are proffered in a separate pleading submitted concurrently. Acceptance of those reply comments would enhance the Commission's ability to evaluate the criticisms of Proposal Two advanced in the PR Comments, and thus create a more complete record for consideration of the Proposal.

Wherefore, the Postal Service respectfully requests leave to file reply comments responding to the initial comments filed in the proceeding by the Public Representative and by UPS.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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